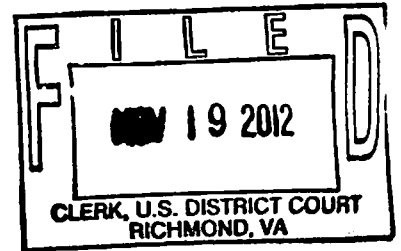


United States District Court
Eastern District of Virginia
Richmond Division
701 East Broad Street, Suite 3000
Richmond, VA 23219
804-916-2220



BETTINA JORDAN
PLAINTIFF,

Case Number: 3:12CV00759-REP

V.

PATRICK R. DONAHOE,
UNITED STATES POSTAL SERVICE,
DEFENDANT

MOTION TO RE-ASSIGN CASE NUMBER 3:12CV00759-REP

Bettina Jordan, Pro se, (hereinafter "Plaintiff") hereby respectfully submit Motion to Reassign Case number 3:12cvoo759-REP against The United States Postal Service (hereinafter "Defendant").

The Plaintiff, employee of the United States Postal (USPS) has brought civil action against the USPS under The Tort Act. The plaintiff submitted a new claim of retaliated against the plaintiff due to prior EEOC activity; these facts are considered an new set of claims against the defendant; but shows an ongoing pattern of retaliation by the defendant.


In the plaintiff defense; she regrets having to file frequent and repetitive filing against the same defendant but the plaintiff continues to endure abusive behavior by the defendant which is considered unlawful- retaliation. And if the plaintiff does not file the new claim of retaliation; the new claim would not be recorded and documented as such. Plaintiff wants to document and present this new information before the court. The defendant has a history of showing no regard for the employment laws.

The new facts of retaliation are based on a plaintiff denial for OWCP compensation reimbursement in which she is entitled to per Federal Employees' Compensation Act (FECA); plaintiff suffered an on the job traumatic injury on February 14, 2012, the claim was accepted by OWCP April 24, 2012. The plaintiff has been subject to slander, libel, defamation; the employing agency have been negligent; publishing false information about the plaintiff; being carelessness on the part of the employing agency; the employing agency has inflicted additional "emotional distress" which happen after the plaintiff civil action case number 3:12CV054 was accepted by The United States District Court for the Eastern District of Richmond for Jury Trial on July 11, 2012.

In light of the new civil claim the plaintiff respectfully request that the new civil case be reassigned. The plaintiff does not want to overburden the court with the new claims on the presiding Judge John A. Gibney, Jr., the Judge in the previous cases number one and two which are now combined into one case.

The plaintiff respectfully request the Honorable Judge John A. Gibney, Jr. to consider the Motion to Re-assign the above referenced civil matter. And again it is with the plaintiff sincere apology to have to file this case; it is not the intent of the plaintiff to burden the court with additional filing against the same defendant without just cause.

Respectfully submitted,

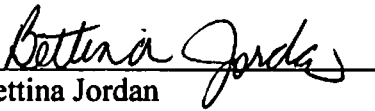

Bettina Jordan
Plaintiff/ Pro se
4024 Harvest Crest Drive
Richmond, VA 23223
Telephone# (804)649-0520
November 19, 2012

Certificate of Service

I hereby certify that a true copy of the foregoing Certificate Reporting Service was hand delivered on this 19th of November to the following:

Hand Delivered

Clerk's Office
United States District Court
Eastern District of Virginia
701 East Broad Street, Suite 3000
Richmond, VA 23219-3528


Bettina Jordan
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November 19, 2012